

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Ernesto Vazquez Jr

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 16, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC 952 and 963

Knowingly and unlawfully, import, attempt to import, and conspire to import from a place outside the United States, to wit: the United Mexican States, to a place in the United States, to wit: Laredo, Texas, a controlled substance listed under Schedule II, Title II, of the Controlled Substances Act, to wit; approximately 4.85 kilograms, gross weight, of methamphetamine.

This criminal complaint is based on these facts:

See attachment "A"

☒ Continued on the attached sheet./s/ Brian Huffman*Complainant's signature*

Submitted by reliable electronic means per Fed.R.Crim.P. 4.1, HSI Special Agent Brian Huffman sworn to and signature attested telephonically on December 20, 2021, at Laredo, Texas.

Brian Huffman HSI Special Agent*Printed name and title*Date: 12/20/2021*Judge's signature*City and state: Laredo, TexasHon. Diana Song Quiroga, US Magistrate Judge*Printed name and title*

ATTACHMENT "A"

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1. On December 16, 2021, Homeland Security Investigations (HSI), Laredo Office Special Agents responded to the Lincoln-Juarez International Bridge in Laredo, Texas (TX), regarding a seizure of methamphetamine by United States Customs and Border Protection (CBP) Officers. As a result, CBP Officers arrested Ernesto Vazquez Jr who was transporting the narcotics inside a vehicle driven by him.
2. CBO Officer (CBPO) Santos Gallegos III explained that, on December 16, 2021, he was manning the primary post, at lane number nine, at the Lincoln-Juarez International Bridge. At approximately 1245 hours, Ernesto VAZQUEZ Jr applied for admission. When asked by CBPO Gallegos III where he was traveling to, VAZQUEZ Jr appeared to be very nervous while stating he was going to get his passport and explaining that he works in Wisconsin at a plant, but work was slow, so he came down to Mexico to visit his kids. When asked for vehicle insurance paperwork, VAZQUEZ Jr's hands were shaking, and he kept fidgeting with the money and papers he had in a cupholder inside the car. While being walked to secondary, CBPO Gallegos III asked VAZQUEZ Jr if he had anything to declare, "fruits, vegetables, plants, meats, firearms, drugs, money in excess of \$10,000 dollars, United States Dollar (USD) alcohol, tobacco or medications?" VAZQUEZ Jr stated he did not.
3. While at secondary, CBPO Kassandra Guerra asked CBPO Martinez to set the vehicle (grey in color Mazda CX-7 bearing Texas plates NBX2956) up for a Canine inspection. Canine Enforcement Officer (CEO) Angel Castaneda along with his Narcotic Human Detection Dog (NHDD) "Karat" badge 1504040 conducted the inspection which resulted in an alert to the driver side rocker panel for the trained odor of narcotics. The vehicle was then taken for a non-intrusive inspection (NII) manned by CBPO Alexander Soler. At this time CBPO Soler confirmed anomalies to both the driver and passenger rocker panels.
4. After further inspecting the vehicle, a trap door was found behind the front tire on the driver side. Utilizing a fiber optic scope on the rocker panel, CBP officers observed a brown in color bundle. A total of nine (9) bundles were retrieved from the driver side rocker panel area of the vehicle. A field test revealed the substance contained in the above-mentioned bundles contained properties similar to methamphetamine. In total, 4.85 kilograms of methamphetamine was seized.
5. On December 16, 2021, CBPO Bennie Rodriguez, HSI Special Agent's (SAs) Franco Borreca and Brian Huffman interviewed VAZQUEZ Jr after reading his Miranda Rights to him. VAZQUEZ Jr voluntarily waived his Rights both verbally and in writing. VAZQUEZ Jr stated he drove the vehicle from Nuevo Laredo, MX to the United States

ATTACHMENT "A"

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6. (U.S.) as a favor to a friend due to feeling pressured. VAZQUEZ Jr stated he had a feeling something may have been inside the vehicle before driving it into the U.S. but was unsure of exactly what. When notified of narcotics being located inside the vehicle, VAZQUEZ Jr appeared to be surprised but stated he was going to be paid \$150 dollars, USD to drive the vehicle into the U.S. VAZQUEZ Jr initially stated he was going to drive the vehicle to Laredo, TX then directly back to MX after getting his passport. VAZQUEZ Jr then stated he was going to meet with a female at her house in Laredo, TX and transfer the vehicle to her. VAZQUEZ Jr then stated he was going to drive the vehicle to Houston, TX. After continuing to question VAZQUEZ Jr, he then said he was going to drive the vehicle to San Antonio, TX.